

Compilation of Public Comments
Bayou Maringouin TMDL for Biochemical Oxygen-Demanding Substances and Nutrients

Commenter	Date Received	Waterbody (ies)	Summary of Comments	Summary of LDEQ Responses
Vicki Murillo, Gulf Restoration Network	8/3/2005	Bayou Maringouin, Subsegment 120111	GRN feels that LDEQ's proposed dissolved oxygen (DO) criterion for Bayou Maringouin is inappropriate. Since none of the relevant reference streams for estimating background loads are in Terrebonne Basin or even in southeastern Louisiana, accuracy of the natural background load estimate is questionable. Dissolved oxygen (DO) standards adjustment resulting from questionable background load estimates could lead to acceptance of continued impairment.	While it is true that the streams mentioned and utilized as reference streams in this TMDL are not located in the Terrebonne Basin, these are the best reference streams currently available. LDEQ has begun to sample reference streams in Terrebonne Basin. Although interrupted by LDEQ's extensive response efforts to recent hurricanes, this sampling will continue. LDEQ draws upon existing data, selecting the waterbodies that are most similar in flow and morphology for use as references.
			GRN believes that the distribution of land uses in Bayou Maringouin's watershed supports the idea that manmade nonpoint source contributions are extensive. Instead of changing criteria and removing designated uses, LDEQ should look for ways to restore this segment and meet the goals of the Clean Water Act.	LDEQ has recently revised its Nonpoint source Management Plan (Section 319 Plan) and U.S. EPA has approved it. As TMDLs are approved, more detailed strategies specific to individual watersheds will be developed outlining the steps that will be taken to implement management measures in those watersheds to address all of their man-induced nonpoint sources. Currently, LDEQ is developing watershed implementation plans for the watersheds with approved TMDLs in Barataria Basin. Following completion and approval of the TMDLs for Terrebonne Basin watersheds, the LDEQ will begin development of implementation plans for these watersheds. LDEQ is committed to working with other agencies at the state and local level to implement on-the-ground controls and best management practices to address the various nonpoint sources of pollution.

Compilation of Public Comments
West Bayou Lacassine TMDL for Wasteload Allocation

Commenter	Date Received	Waterbody (ies)	Summary of Comments	Summary of LDEQ Responses
Vicki Murillo, Gulf Restoration Network	7/18/2005	West Bayou Lacassine, Subsegment 050601	GRN believes that additional nonpoint source load reductions or greater treatment levels at the syrup mill are necessary in order for water quality standards to be met in the West Bayou Lacassine Tributary. By allowing another point source to discharge into the watershed, LDEQ is essentially using up all or a portion of the margin of safety established for point sources in the Bayou Lacassine watershed TMDL.	LDEQ acknowledges that GRN's comments concerning the syrup mill in this subsegment are appropriate. LDEQ will incorporate nonpoint source reduction and monitoring requirements in the wastewater discharge permit for the mill. Plans for the mill include retention ponds and internal recycling of water to minimize discharge.
			GRN is worried that monitoring dissolved oxygen in two instream locations may not be sufficient to ensure that the necessary reductions in nonpoint source pollution actually occur.	If future monitoring results show further decline in the water quality conditions in Bayou Lacassine following opening of the new syrup mill, the wastewater discharge permit for the syrup mill will be modified.
			GRN wonders if progress has occurred in the implementation of the Bayou Lacassine TMDL, originally developed over four years ago.	LDEQ has attached a spreadsheet showing the level of implementation of BMPs in the basin in acreage that has been or will be treated with BMPs.
			The Water Quality Criteria section of this WLA lists the sulfate criterion for Bayou Lacassine as 30 mg/l maximum. However, Title 33 Part IX of the 2005 Edition of Louisiana's Environmental Regulatory Code gives a sulfate criterion of 10 mg/l for this subsegment.	The error in the water quality criterion for sulfate shown in the wasteload allocation report has been corrected. LDEQ thanks GRN for pointing out this error.

Compilation of Public Comments
Bayou Petit Caillou TMDL for Oxygen-Demanding Substances

Commenter	Date Received	Waterbody (ies)	Summary of Comments	Summary of LDEQ Responses
Vicki Murillo, Gulf Restoration Network	8/3/2005	Bayou Petit Caillou, Subsegment 120503	GRN feels that LDEQ's proposed dissolved oxygen (DO) criterion for Bayou Petit Caillou is inappropriate. Since none of the relevant reference streams for estimating background loads are in Terrebonne Basin or even in southeastern Louisiana, accuracy of the natural background load estimate is questionable. Dissolved oxygen (DO) standards adjustment resulting from questionable background load estimates could lead to acceptance of continued impairment.	While it is true that the streams mentioned and utilized as reference streams in this TMDL are not located in the Terrebonne Basin, these are the best reference streams currently available. LDEQ has begun to sample reference streams in Terrebonne Basin. Although interrupted by LDEQ's extensive response efforts to recent hurricanes, this sampling will continue. LDEQ draws upon existing data, selecting the waterbodies that are most similar in flow and morphology for use as references.
			GRN believes that the distribution of land uses in Bayou Petit Caillou's watershed supports the idea that manmade nonpoint source contributions are extensive. Instead of changing criteria and removing designated uses, LDEQ should look for ways to restore this segment and meet the goals of the Clean Water Act.	LDEQ has recently revised its Nonpoint Source Management Plan (Section 319 Plan) and U.S. EPA has approved it. As TMDLs are approved, more detailed strategies specific to individual watersheds will be developed outlining the steps that will be taken to implement management measures in those watersheds to address all of their man-induced nonpoint sources. Currently, LDEQ is developing watershed implementation plans for the watersheds with approved TMDLs in Barataria Basin. Following completion and approval of the TMDLs for Terrebonne Basin watersheds, the LDEQ will begin development of implementation plans for these watersheds. LDEQ is committed to working with other agencies at the state and local level to implement on-the-ground controls and best management practices to address the various nonpoint sources of pollution.